



1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto  
 2 Trucking”) submits this motion for an order to file under seal its Motion to Compel (the  
 3 “Motion”). Specifically, Otto Trucking requests an order granting leave to file under seal the  
 4 confidential portions of the following documents:

Document	Portions to Be Filed Under Seal
Letter Brief re Motion to Compel	Highlighted portions
Vu Declaration	Highlighted portions
Exhibit 3 to Vu Declaration	Entire document
Exhibit 4 to Vu Declaration	Entire document
Exhibit 5 to Vu Declaration	Entire document
Exhibit 6 to Vu Declaration	Entire document
Exhibit 7 to Vu Declaration	Entire document
Exhibit 8 to Vu Declaration	Highlighted portions
Exhibit 9 to Vu Declaration	Highlighted portions
Exhibit 11 to Vu Declaration	Entire document
Exhibit 12 to Vu Declaration	Entire document
Exhibit 13 to Vu Declaration	Entire document
Exhibit 14 to Vu Declaration	Entire document
Exhibit 15 to Vu Declaration	Entire document
Exhibit 16 to Vu Declaration	Highlighted portions
Exhibit 17 to Vu Declaration	Highlighted portions

23 The above referenced documents and portions of documents contain information  
 24 designated by Plaintiff Waymo LLC as either Highly Confidential—Attorneys’ Eyes Only” or  
 25 “Confidential” under the terms of the parties’ protective order. Otto Trucking takes no position as  
 26 to the merits of the confidentiality designations in these documents.

27 Otto Trucking anticipates that Waymo will file a declaration in accordance with Local  
 28 Rule 79-5.

1 Otto Trucking's request to seal is narrowly tailored to those portions of the Motion and its  
2 supporting documents that merit provisional sealing.

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4 Dated: August 23, 2017

Respectfully submitted,

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1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that I electronically filed the foregoing document including all of its  
3 attachments with the Clerk of the Court for the United States District Court for the Northern  
4 District of California by using the CM/ECF system on August 23, 2017. I further certify that all  
5 participants in the case are registered CM/ECF users and that service of the publicly filed  
6 documents will be accomplished by the CM/ECF system.

7                   I certify under penalty of perjury that the foregoing is true and correct. Executed this 23rd  
8 day of August 2017 in Los Angeles, California.

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Hong-An Vu

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